

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

CHILDREN'S HEALTH DEFENSE,
ROBERT F. KENNEDY, JR., TRIAL SITE,
INC., CREATIVE DESTRUCTION MEDIA,
LLC, ERIN ELIZABETH FINN, JIM HOFT,
DR. BEN TAPPER, BEN SWANN, DR.
JOSEPH MERCOLA, TY BOLLINGER &
CHARLENE BOLLINGER,

Plaintiffs,

Civil Action No. 2:23-cv-00004-Z

v.

WP COMPANY LLC D/B/A THE
WASHINGTON POST, THE BRITISH
BROADCASTING CORP., THE
ASSOCIATED PRESS, & REUTERS,

Defendants.

DECLARATION OF JANE BARRETT

I, Jane Barrett, declare as follows:

1. I submit this declaration in support of Defendants' Motion to Transfer in the above-captioned matter. I have personal knowledge of the facts set forth herein.
2. I am Global Editor for Media News Strategy of Reuters. I was previously the Global Head of Multimedia. I am based in London, England. I report to the current Editor in Chief of Reuters, Alessandra Galloni, who is located in London.
3. Reuters is the news and media division of Thomson Reuters. As a news agency (also known as a wire service), Reuters provides business, financial, national, and international news to the world's media organizations and via desktop terminals. Reuters also distributes the

news directly to consumers via Reuters.com and other platforms. Within Europe, Reuters' principal place of business is in London.

4. Reuters' principal place of business within the United States, and the location of the majority of its U.S.-based editorial staff, is New York, NY.

5. Reuters also has U.S.-based editorial staff in the District of Columbia.

6. I am familiar with the Trusted News Initiative ("TNI"), which is an initiative organized by the British Broadcasting Corporation ("BBC") to share instances of serious misinformation and discuss trends in misinformation on social media platforms and elsewhere.

7. Reuters' involvement in the TNI has been limited to attending periodic calls, executive meetings, and annual conferences with other TNI members. The 2021 and 2022 annual conferences were held virtually. The 2023 conference was hybrid, with some in-person sessions in London.

8. Reuters' first liaison to the TNI meetings was Hazel Baker, former head of user-generated content newsgathering. Ms. Baker worked out of the Reuters office in London, England. To the best of my knowledge, to the extent Ms. Baker attended the TNI meetings, she did so virtually from England. To the best of my knowledge, Ms. Baker is still located in England.

9. In September 2022, Stephanie Burnett became Reuters' liaison to the TNI meetings. To the best of my knowledge, to the extent Ms. Burnett attended the TNI meetings, she did so virtually from the Netherlands. Ms. Burnett also attended the 2023 annual conference in-person in London. To the best of my knowledge, Ms. Burnett is currently located in the Netherlands.

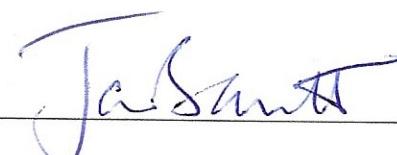
10. Since 2019, I have also attended the TNI meetings virtually, and occasionally in person, from London.

11. Few other Reuters employees have had any involvement with the TNI. Michael Friedenberg, former President of Reuters, attended the TNI executive meetings in 2020. He was located in New York, NY at the time, and the meetings were held virtually. Steve Adler, former Editor in Chief of Reuters, was involved in discussions about joining the TNI, and he was located in New York, NY at the time. To the best of my knowledge, Mr. Friedenberg is still located in New York and/or Pennsylvania, and Mr. Adler is still located in New York.

12. Any documentary evidence I possess related to Reuters' participation in the TNI is located in London or in Reuters' electronic data management system.

13. No Reuters employees currently or previously involved with the TNI are or were located in Texas at the relevant time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on April 18, 2023.



JANE BARRETT